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December 7, 2023

***Via ECF and Email***

The Honorable Cathy Seibel  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Application granted.

SO ORDERED.

  
CATHY SEIBEL, U.S.D.J.

12/8/23

**Re: United States v. Brian Downey**  
**Case No. 23-cr-00087 (CS)**

Dear Judge Seibel:

As the Court is aware, the undersigned and The Quinn Law Firm represent Defendant Brian Downey ("Mr. Downey") in connection with the above-referenced matter.

We respectfully petition the Court to give Defendant Brian Downey permission to travel to Manahawkin, New Jersey from Saturday December 16, 2023 through Monday, December 18, 2023, to allow him to attend his nephew's wedding. The name of the hotel The Mainland, a Holiday Inn, located at 151 NJ-72, Manahawkin, New Jersey 08050. The hotel is the same location for the sleeping accommodations, the wedding ceremony and reception. Mr. Downey will be staying in an adjoining room with his mother who is currently home-bound but will be attending the wedding. We have spoken with AUSA Steven Kochevar and Andrew Abbott of Pretrial Services, who have no objection to this request.

We thank the Court for its time and consideration and should the Court have any questions or concerns then please feel free to contact the undersigned.

Respectfully submitted,

*Andrew C. Quinn*

Andrew C. Quinn, Esq.

ACQ:sjb

cc: AUSA Steven Kochevar, U.S. Attorney's Office (*via ECF*)